

EXHIBIT A

LBBS Proposed 12-5-2022

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DELAWARE STATE SPORTSMEN'S	:	
ASSOCIATION, INC; BRIDGEVILLE	:	
RIFLE & PISTOL CLUB, LTD.;	:	
DELAWARE RIFLE AND PISTOL CLUB;	:	C.A. No.: 22-cv-00951-RGA
DELAWARE ASSOCIATION OF	:	
FEDERAL FIREARMS LICENSEES;	:	
MADONNA M. NEDZA; CECIL CURTIS	:	
CLEMENTS; JAMES E. HOSFELT, JR;	:	
BRUCE C. SMITH; VICKIE LYNN	:	
PRICKETT; and FRANK M. NEDZA,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
DELAWARE DEPARTMENT OF	:	
SAFETY AND HOMELAND SECURITY;	:	
NATHANIAL MCQUEEN JR. in his	:	
official capacity as Cabinet Secretary,	:	
Delaware Department of Safety and	:	
Homeland Security; and COL. MELISSA	:	
ZEBLEY in her official capacity as	:	
superintendent of the Delaware State Police,	:	
	:	
Defendants.	:	
	:	

**[PROPOSED] SCHEDULING ORDER WITH BRIEFING
DEADLINE ON PENDING DISPOSITIVE MOTION**

This ____ day of December, 2022, the Court having conducted an initial Rule 16(b) scheduling conference pursuant to Local Rule 16.1(b), and the parties having

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determined after discussion that the matter cannot be resolved at this juncture by settlement, voluntary mediation, or binding arbitration;

1. Rule 26(a)(1) Initial Disclosures. Unless otherwise agreed to by the parties, the parties shall make their initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) within five days of the date of this Order.

2. Joinder of Other Parties and Amendment of Pleadings. All motions to join other parties, and to amend or supplement the pleadings, shall be filed on or before December 9, 2022,

3. Discovery. There will be no formal discovery until after the Court's ruling on the pending dispositive motions.

4. Papers Filed Under Seal. When filing papers under seal, counsel shall deliver to the Clerk an original and one copy of the papers. A redacted version of any sealed document shall be filed electronically within seven days of the filing of the sealed document.

5. Courtesy Copies. The parties shall provide to the Court two courtesy copies of all briefs and one courtesy copy of any other document filed in support of any briefs (i.e., appendices, exhibits, declarations, affidavits etc.). This provision also applies to papers filed under seal.

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6. Case Dispositive Motions. A Motion for Preliminary Injunction and a Motion for Partial Dismissal have been filed.

(a) The parties will agree to complete briefing by January 16, 2023 on the Motion for Preliminary Injunction.

(b) Plaintiffs seek a hearing on their Motion for Preliminary Injunction by January 31, 2023, if the Court is available.

(c) Briefing on the Motion for Partial Dismissal is stayed until a decision is made on the Motion for Preliminary Injunction.

7. Applications by Motion. Except as otherwise specified herein, any application to the Court shall be by written motion. Any non-dispositive motion should contain the statement required by Local Rule 7.1.1

8. Pretrial Conference. On _____, 20__, the Court will hold a Rule 16(e) final pretrial conference in Court with counsel beginning at _____ .m. The parties shall file a joint proposed final pretrial order in compliance with Local Rule 16.3(c) no later than 5 p.m. on the third business day before the date of the final pretrial conference. Unless otherwise ordered by the Court, the parties shall comply with the timeframes set forth in Local Rule 16.3(d) for the preparation of the proposed joint final pretrial order.

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9. Motions in Limine. Motions in limine shall not be separately filed. All in limine requests and responses thereto shall be set forth in the proposed pretrial order. Each party shall be limited to three in limine requests, unless otherwise permitted by the Court. The in limine request and any response shall contain the authorities relied upon; each in limine request may be supported by a maximum of three pages of argument and may be opposed by a maximum of three pages of argument, and the party making the in limine request may add a maximum of one additional page in reply in support of its request. If more than one party is supporting or opposing an in limine request, such support or opposition shall be combined in a single three page submission (and, if the moving party, a single one page reply). No separate briefing shall be submitted on in limine requests, unless otherwise permitted by the Court.

10. Jury Instructions, Voir Dire, and Special Verdict Forms. Where a case is to be tried to a jury, pursuant to Local Rules 47.1(a)(2) and 51.1, the parties should file (i) proposed voir dire, (ii) preliminary jury instructions, (iii) final jury instructions, and (iv) special verdict forms no later than 5 p.m. on the third business day before the date of the final pretrial conference. The plaintiff should expect to submit to an email address to be designated each of the foregoing four documents in WordPerfect format. Plaintiffs do not seek a jury trial.

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11. Trial. This matter is scheduled for a ___ day ____ trial beginning at 9:30 a.m. on _____, 20__, with the subsequent trial days beginning at 9:30 a.m. Until the case is submitted to the jury for deliberations, the jury will be excused each day at 4:30 p.m. The trial will be timed, as counsel will be allocated a total number of hours in which to present their respective cases.

12. ADR Process. This matter is referred to a magistrate judge to explore the possibility of alternative dispute resolution.

UNITED STATES DISTRICT JUDGE